

1 GREENBERG TRAURIG, LLP
2 IAN C. BALLON (SBN 141819)
3 WENDY M. MANTELL (SBN 225544)
4 LORI CHANG (SBN 228142)
5 2450 Colorado Avenue, Suite 400E
6 Santa Monica, CA 90404
7 Telephone: (310) 586-7700
8 Facsimile: (310) 586-7800
9 Email: ballon@gtlaw.com, mantellw@gtlaw.com,
10 changl@gtlaw.com

11 Attorneys for defendants
12 Rapidshare AG, Christian Schmid, and Bobby Chang

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California
corporation,

Plaintiff,

v.

RAPIDSHARE A.G., a corporation,
CHRISTIAN SCHMID; BOBBY
CHANG; and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. 09 CV 2596 H (WMC)

**DEFENDANTS' NOTICE OF MOTION
AND MOTION TO DISMISS FOR LACK
OF PERSONAL JURISDICTION**

[Filed concurrently with Memorandum;
Declarations of L. Pfaff, D. Raimer, B. Hess,
and L. Chang]

DATE: May 10, 2010
TIME: 10:30 a.m.
CTRM: 13
JUDGE: Hon. Marilyn L. Huff

DATE FILED: November 18, 2009
TRIAL DATE: None Set

1 **TO ALL PARTIES:**

2 PLEASE TAKE NOTICE that on May 10, 2010, at 10:30 a.m., in courtroom 13 of
3 the above-captioned court, located at 940 Front Street, San Diego, California, defendants
4 RapidShare AG, Christian Schmid, and Bobby Chang, will and hereby collectively move
5 pursuant to Federal Rule of Civil Procedure 12(b)(2) for an order dismissing the claims
6 asserted against them on the ground that the Court lacks personal jurisdiction over the
7 defendants.

8 This Motion is based upon this Notice of Motion and Motion, the accompanying
9 Memorandum of Points and Authorities, the Declarations of Lutz Pfaff, Burkhard Hess,
10 Lori Chang, and Daniel Raimer (which further attaches as exhibits the Declarations of
11 Christian Schmid and Bobby Chang), and all Exhibits thereto submitted concurrently
12 with this Motion and Memorandum, the pleadings on file in this matter, and any
13 arguments made at the hearing on this Motion.

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15 DATED: March 23, 2010

GREENBERG TRAURIG, LLP

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17 By: /s/ Wendy M. Mantell

18 Wendy M. Mantell
19 Attorneys for defendants RapidShare AG,
20 Christian Schmid, and Bobby Chang
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